

REMARKS

This application has been reviewed in light of the Office Action dated October 31, 2005. In view of the foregoing amendments and the following remarks, favorable reconsideration and withdrawal of the rejection set forth in the Office Action are respectfully requested.

Claims 43, 45-49, 51, 52, 54, 55, 57, 58, 60 and 61 are pending. Claim 44 has been canceled, without prejudice or disclaimer of subject matter. All of the pending claims have been amended. Support for the claim changes can be found in the original disclosure, and therefore no new matter has been added. All of the pending claims are in independent form.

Claims 43-49, 51, 52, 54, 55, 57, 58, 60 and 61 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,078,886 (*Dragosh et al.*). Since Claim 44 has been canceled, the rejection of that claim is moot. Applicants respectfully traverse the rejections of the other claims. For at least the following reasons, the pending claims are believed to be patentable over the applied art.

Among the pending claims, Claim 43 (system), Claims 45 and 46 (apparatus), Claims 51 and 52 (method) and Claims 57 and 58 (computer readable memory storing program code) are corresponding claims. Claim 47 (system), Claims 48 and 49 (apparatus), Claims 54 and 55 (method) and Claims 60 and 61 (computer readable memory storing program code) are also corresponding claims.

According to the claimed invention, a client displays a speech input window comprising plural input forms, and determines from among the displayed plural input forms an input form to which speech information is input as a target speech input. The client transmits

input form identifying information indicating the determined input form to a server when an input form to be used for speech input is determined. See, e.g., page 12, lines 6-14 of the specification.

According to the claimed invention, the client may transmit input form identifying information corresponding to the determined input form to a server before speech is actually input to the determined input form, whereby the server can set a speech recognition dictionary corresponding to the received input form identifying information in advance. Therefore, the server can quickly start an appropriate speech recognition process with the set recognition dictionary, when speech to be recognized is received from the client.

According to Claims 43, 45, 46, 51, 52, 57 and 58, speech recognition is performed using a user dictionary from a client and a recognition dictionary at a server. According to Claims 47-49, 54, 55, 60 and 61, speech recognition is performed using only a recognition dictionary at a server.

Dragosh et al. relates to a system and method for providing remote automatic speech recognition (ASR) services via a packet network. According to *Dragosh et al.*'s system, a client 130 sends a grammar (data file), or a grammar identifier or IP address, to a server 100; the client 130 selects a grammar rule to be activated and sends an activation request to the server 100, which activates the rule; the client 130 sends input speech, or compressed input speech or features extracted from input speech, to the server 100; the server 100 performs speech recognition on the speech (information) received from the client 130 using, and constrained by, the grammar and the rule; and the server 100 returns text (recognized speech) to the client 130. A grammar includes a set of words expected to be used in a given context. A grammar rule

defines the combinations of words expected to be formed, from the words of the given grammar, in the given context.

One variation of *Dragosh et al.*'s system is a form-filling service for completing a form (in response to spoken responses to information requests for each of a number of blanks in the form). This variation is described at col. 9, lines 17-30, and nowhere else, in *Dragosh et al.* The Office Action cites col. 9, lines 14-30 of *Dragosh et al.* as the basis for many features of Applicants' claimed invention involving an "input form" and/or "input form identifying information." Applicants submit that this portion of *Dragosh et al.* fails to suggest some if not all of the features of Applicants' claimed invention that the Office Action alleges are taught by it.

Col. 9, lines 14-30 of *Dragosh et al.* read as follows:

In addition to the simple pizza ordering example used above for illustration, a wide array of potential ASR services may be provided over a packet network in accordance with the present invention. One example of an ASR application enabled by the present invention is a form-filling service for completing a form in response to spoken responses to information requested for each of a number of blanks in the form. In accordance with the present invention, a form-filling service may be implemented wherein ASR client 130 sends grammars representing the possible choices for each of the blanks to ASR server 100. For each blank, ASR client 130 requests activation of the appropriate grammar rule and sends a corresponding spoken answer made in response to a request for information needed to complete the blank. ASR server 100 applies an appropriate speech recognition algorithm in accordance with the selected grammar and rule, and returns text to be inserted in the form.

With regard to the features of Applicants' claimed invention to which the Examiner applies col. 9, lines 14-30 of *Dragosh et al.*, the most pertinent part of that portion of *Dragosh et al.* states that the client 130 sends grammars representing the possible choices for each of the blanks to the server 100 and that, for each blank, the client requests activation of the

appropriate grammar rule and sends a corresponding spoken answer made in response to a request for information needed to complete the blank.

It is noted that col. 8, lines 55-60 of *Dragosh et al.* state:

While typically a grammar rule will be activated prior to the initiation of transmission of speech information from ASR client 130 to ASR server 100, rule activation could take place after some or all of the speech information to be recognized has been sent from ASR client 130 to ASR server 100.

None of the above-quoted contents of *Dragosh et al.* suggest any of a number of features of Applicants' claimed invention.

For example, independent Claim 43 recites, *inter alia*, "first transmission means for transmitting input form identifying information indicating the input form determined when said determining means determines the input form." *Dragosh et al.* teaches that the client sends the server a grammar, a request to activate a rule, and speech to be recognized. Even if, for the sake of argument, *Dragosh et al.*'s grammar be deemed to correspond to the input form identifying information recited in Claim 43 (as suggested by the Office Action at page 3, lines 1-2), nothing in *Dragosh et al.* teaches or suggests that, in the context of *Dragosh et al.*'s form-filling variation, *Dragosh et al.*'s grammar is transmitted when a determining means determines the input form (corresponding to the grammar) to be used with a given speech input. Applicants submit that nothing in *Dragosh et al.* would teach or suggest "transmitting input form identifying information indicating the input form determined when said determining means determines the input form."

Independent Claim 43 also recites, *inter alia*, "holding means for holding a plurality of kinds of recognition dictionaries, and a table managing a correspondence of the input

form identifying information and each of the plurality of kinds of recognition dictionaries,” and “setting means for setting one or more recognition dictionaries corresponding to the received input form identifying information from said holding means by referring to the table.” According to *Dragosh et al.*’s form-filling variation, the client sends to the server a grammar for each blank, as well as a rule activation request and speech for each blank. Even if, for the sake of argument, the server is deemed to be capable of storing a grammar and a rule, and *Dragosh et al.*’s grammar is deemed to correspond to a recognition dictionary such as is recited in Claim 43, nothing in *Dragosh et al.* is understood to teach or suggest the above-quoted holding means or setting means. If *Dragosh et al.*’s grammar is deemed to correspond to a recited “recognition dictionary,” then no element in *Dragosh et al.* is seen to correspond to the recited “input form identifying information”; if *Dragosh et al.*’s grammar is deemed to correspond to the recited “input form identifying information,” then no element in *Dragosh et al.* is seen to correspond to the recited “recognition dictionaries.” Further, nothing is seen in *Dragosh et al.* that corresponds to the recited “table managing a correspondence of the input form identifying information and each of the plurality of kinds of recognition dictionaries,” or the recited operation of “referring to the table.”

The above-quoted holding means and setting means were previously included at least in part in Claim 44, which has been canceled herein. In the rejection of Claim 44 in the last Office Action, the Examiner cited col. 5, line 1 - col. 6, line 67 of *Dragosh et al.* While that portion of *Dragosh et al.* makes reference to grammars and rules and certain basic operations of *Dragosh et al.*’s system noted above, nothing therein is seen to suggest, e.g., the recited “table managing a correspondence of the input form identifying information and each of the plurality of

kinds of recognition dictionaries,” the recited operation of “referring to the table,” or the remainder of the recited “setting means.”

As set forth in M.P.E.P. 2131, “[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” Since *Dragosh et al.* is not seen to suggest all of the elements of Claim 43, that claim is believed allowable over that reference.

Since each of Claims 45, 46, 51, 52, 57 and 58 recites at least some of the above-discussed features of Claim 43, those claims are believed allowable over *Dragosh et al.* for at least the reasons set forth above.

Independent Claim 47 recites, *inter alia*, “first transmission means for transmitting recognition dictionaries identifying information corresponding to the input form determined when said determining means determines the input form,” “first receiving means for receiving the recognition dictionaries identifying information,” and “setting means for setting one or more recognition dictionaries corresponding to the recognition dictionaries identifying information received by the first receiving means.” It is believed that Applicants’ arguments against *Dragosh et al.* set forth above with respect to particular features of Claim 43 apply, *mutatis mutandis*, to these quoted features of Claim 47. For example, as discussed above, nothing in *Dragosh et al.* is seen to suggest a transmission “when said determining means determines the input form,” as defined in the claimed combinations. For another example, as discussed above, nothing in *Dragosh et al.* is seen to suggest “recognition dictionaries identifying information corresponding to the input form determined,” (i.e., two separate elements:

recognition dictionaries and information corresponding to the determined input form), as defined in the claimed combinations.

Since each of Claims 48, 49, 54, 55, 60 and 61 recites at least some of the above-discussed features of Claim 47, those claims are believed allowable over *Dragosh et al.* for at least the same reasons.

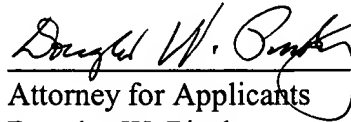
(In the Office Action, the Examiner repeatedly cited extended portions (e.g., two-column or three-column portions) of *Dragosh et al.* as corresponding to specific elements of Applicants' claims. If *Dragosh et al.* is applied to these claims in a subsequent Office Action, the Examiner is respectfully requested to identify which specific elements in that reference are deemed to correspond to particular elements of Applicants' claims, rather than cite such extended portions of the reference without specifying individual elements.)

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. These claims are therefore believed patentable over the art of record.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our Washington office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

A handwritten signature in cursive script, reading "Douglas W. Pinsky", is written over a horizontal line. A long, thin, curved line extends from the end of the signature towards the upper right corner of the page.

Attorney for Applicants
Douglas W. Pinsky
Registration No. 46,994

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200
DWP/klm

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